

experience in the field of computer information design. The following paragraphs provide additional details regarding why Lloyd et al. are not presently claiming the same subject matter as claimed in the subject application:

(a) claim 1 of the Lloyd et al. patent application describes a “single stylesheet defining specifications for outputting content in multiple outputs” that comprises “instructions within the single stylesheet identifying information to be output” and “instructions with the single stylesheet defining at least one format for at least a portion of the information for each of the multiple outputs ...” Claim 1 of this invention, in contrast, describes an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not a “single stylesheet” having the recited set of “instructions.” Independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in claim 1 and, thus, these independent claims do not claim the subject matter in claim 1 of Lloyd et al. either.

(b) claim 12 of the Lloyd et al. patent application describes a “computer program product” including “code” for “creating one stylesheet for formatting information to be output in multiple formats,” wherein the code configures the computer “to effect receiving of the input file,” to “determine at least one element within the input file,” to “determine a formatting rule applicable to the at least one element,” to “apply the formatting rule to the at least one element,” and “for storing the at least one element having the formatting rule applied thereto as the output file of the second file type.” Claim 1 of the present invention, in contrast, describes an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within

the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not a “computer program product” having the recited set of code functions described above. Independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in claim 1 and, thus, these independent claims do not claim the subject matter in claim 12 of Lloyd et al. either.

(c) claim 13 of the Lloyd et al. patent application describes a “computer data signal embodied in a transmission medium” including “code segments” that include instructions for “receiving an input file,” for “determining at least one element within the input file,” for “determining a formatting rule applicable to the at least one element,” for “applying an appropriate formatting rule to the at least one element,” and “for storing the at least one element having the formatting rule applied thereto as the output file of the second file type.” Claim 1 of the present invention, in contrast, describes an “integrated visual design environment” having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not a “computer data signal embodied in a transmission medium” having the code segment instructions that provide the recited set of functions described above. Independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in claim 1 and, thus, these independent claims do not claim the subject matter in claim 13 of Lloyd et al. either.

(d) claim 14 of the Lloyd et al. patent application describes a “computer data signal embodied in a transmission medium” including “code segments” that include instructions for “receiving and reading an input file,” and “applying an appropriate formatting rule to at least one element within the input file for each of at least two output formats, resulting in a formatted element consistent with the formatting rule when output in one of the at least two output formats.” Claim 1 of the present invention, in contrast,

describes an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not a “computer data signal embodied in a transmission medium” having the code segment instructions that provide the recited set of functions described above. Independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in my claim 1 and, thus, these independent claims do not claim the subject matter in claim 14 of Lloyd et al. either.

(e) claim 15 of the Lloyd et al. patent application describes a “method for outputting information in one of several output formats using a single stylesheet,” by “providing for determining an element that is to be output,” “providing for determining a formatting rule applicable to the element for each of several output formats,” and “providing for applying the formatting rule to the element consistent with the output format.” It is somewhat unclear what Lloyd et al. mean when they say “providing for determining” or “providing for applying,” but nevertheless note that the inventors there are not claiming an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” Indeed, in this claim the inventors in Lloyd et al. appear to assume that the “single stylesheet” already exists and, in effect, they describe using that “single stylesheet” in the manner recited by the identified steps. Claim 1, in contrast, describes in the “integrated visual design environment” with the recited elements and associated code function for generating the meta stylesheet. This is not what Lloyd et al. claim 15 purports to describe. Independent claim 15 (a “data processing system having ... a display environment”) has similar limitations as in my claim 1 and, thus, this independent claim does not claim the subject

matter in claim 15 of Lloyd et al. either. Independent claim 20 does describes a “display method,” which is somewhat related to the “method for outputting” described in Lloyd et al. claim 15. Claim 20, however, includes at least three (3) limitations that are not seen in Lloyd et al. claim 15; these limitations include: displaying, in juxtaposition, a structured data source and a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service; responsive to selection and positioning in the document being designed of given design elements or attributes from the structured data source, generating given program code; and selectively displaying a preview of an output document rendered as a result of applying a given one of the program code instances. These steps do not find correspondence in the method of claim 15 recited in Lloyd et al. For at least this reason, claim 15 of Lloyd et al. and claim 20 of my application are not claiming the same subject matter.

(f) claim 16 of the Lloyd et al. patent application describes a “method for outputting information in multiple formats using a single stylesheet,” by “determining an element that is to be output,” “determining at least one formatting rule for each element based on the form of output,” and “applying the formatting rule to the element consistent with the output format selected for the element.” Once again, the inventors there are not claiming an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” As before, in this claim the inventors in Lloyd et al. appear to assume that the “single stylesheet” already exists and then describe using that “single stylesheet” in the manner recited by the identified steps. Claim 1, in contrast, describes in the “integrated visual design environment” with the recited elements and associated code function for generating the meta stylesheet. This is not what Lloyd et al. claim 16 purports to describe. Independent claim 15 (a “data processing system having ... a display environment”) has similar limitations as in claim 1 and, thus, this independent claim does not claim the subject matter in claim 16 of Lloyd et

al. either. Independent claim 20 does describes a “display method,” which as discussed above is somewhat related to the “method for outputting” described in Lloyd et al. claim 16. Claim 20, however, includes at least three (3) limitations that are not seen in Lloyd et al. claim 16; these limitations include: displaying, in juxtaposition, a structured data source and a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service; responsive to selection and positioning in the document being designed of given design elements or attributes from the structured data source, generating given program code; and selectively displaying a preview of an output document rendered as a result of applying a given one of the program code instances. These steps do not find correspondence in the method of claim 16 recited in Lloyd et al. For at least this reason claim 16 of Lloyd et al. and claim 20 of my application are not claiming the same subject matter.

(g) claim 18 of the Lloyd et al. application describes a “method for publishing information” by “receiving information in an input file,” and “publishing the information in multi-channels using a single stylesheet,” wherein the “single stylesheet applies formatting rules to elements within the input file, the formatting rules being adapted for multi-channels.” This claim assumes the existence of the “single stylesheet” and describes how that single stylesheet is used. The subject claims, in contrast, deal with a different invention: an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not a method for publishing information using an existing “single stylesheet.” Independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in claim 1 and, thus, these independent claims do not claim the subject matter in claim 18 of Lloyd et al. either.

(h) claim 19 of the Lloyd et al. patent application describes a “method for creating a stylesheet capable of outputting information in one of multiple output file types using a single stylesheet” by a set of steps. These steps include: “within a single stylesheet, identifying and tagging at least one element within the input file,” “associating a style with the at least one element,” and “selecting an output file type, wherein the style may vary according to the output file selected.” The claim describes the process of generating the single stylesheet so that it has sufficient information for generating the output information in the selected output file type. The subject invention is not claiming the details of a “meta stylesheet” within the context of the overall invention; rather, the claims describe an “integrated visual design environment having a first display panel, and a second display panel, together with code “responsive to selection and positioning in the second display panel of given design elements or attributes ... for generating a meta stylesheet, as well as code “for automatically generating from the meta stylesheet two or more stylesheets from within the visual design environment ...” An “integrated visual design environment” with the recited elements and associated code functions are not the same method for creating a “stylesheet” such as described in claim 19; likewise, my independent claims 15 (a “data processing system having ... a display environment”) and 20 (a “display method”) have similar limitations as in claim 1 and, thus, these independent claims do not claim the subject matter in claim 19 of Lloyd et al. either.

(i) claim 32 of the Lloyd et al. patent application describes a “system for outputting content to various output media formats” comprising “means for identifying information to be output; and means for associating at least one formatting rule with the information to be output, wherein the means further comprises associating a formatting rule for the information to be output for outputting in multiple output forms.” The subject claims do not recite the functions here, namely, “identifying information to be output,” or “associating a formatting rule for the information to be output for outputting in multiple output forms,” so claim 32 does not describe subject matter that overlaps with the subject matter of any of independent claims 1, 15 or 20.

In summary, given that the inventors reduced to practice the subject matter of the claims prior to May 5, 2003, and given that Lloyd et al. are not claiming the same invention as the invention claimed in the subject application, the Examiner is requested to withdraw Lloyd et al. as a reference.

The Altova Reference Manual should be withdrawn

Pursuant to 37 C.F.R. § 1.132, the inventor declarations further establish that the Altova Reference Manual cited by the Examiner is merely a publication of the inventors' own work or was otherwise authored by Altova employees under the inventors' supervision and control. See, Falk Declaration at paragraph 16, Gavrielov Declaration at paragraph 10. The Reference Manual is not a statutory bar, as it was published on January 22, 2003. Thus, the Examiner is also requested to withdraw the Reference Manual. See, M.P.E.P §715.01(c).

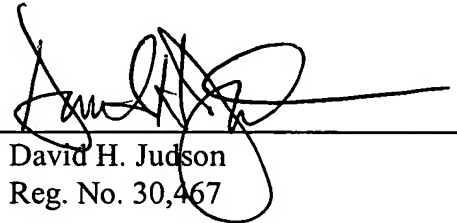
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With these citations removed, independent claims 1, 15 and 20 are now in condition for prompt allowance, as our dependent claims 2-4 and 6-19.

Also attached is an Information Disclosure Statement that identifies several additional Altova reference manuals, together with a petition fee of \$180.00.

Reconsideration and favorable action are respectfully requested.

The Examiner also is reminded that this case is on accelerated examination.

By: 
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